

**Before the  
Federal Communications Commission  
Washington, D.C. 20554**

In the Matter of )  
 )  
Improving 9-1-1 Reliability ) PS Docket No. 13-75  
 )

**REPLY COMMENTS OF THE ALLIANCE FOR  
TELECOMMUNICATIONS INDUSTRY SOLUTIONS**

The Alliance for Telecommunications Industry Solutions (ATIS) hereby submits these reply comments in response to the *Public Notice* released June 13, 2018, in the above-referenced docket. ATIS’ reply comments respond to recommendations from commenters related to the scope of the Commission’s “covered 9-1-1 service provider” rules.

ATIS NRSC is concerned with some commenters’ recommendations to modify the Commission’s definition of “covered 9-1-1 service provider.” The Association of Public-Safety Communications Officials-International, Inc. (APCO), for example, recommends that the Commission expand the definition of “covered 9-1-1 service provider” to include “any entity that provides 9-1-1, E9-1-1, or NG9-1-1 capabilities, directly or indirectly.”<sup>1</sup> ATIS believes that this recommendation is too broad and could expand 9-1-1 obligations unnecessarily to companies that may have no or little potential impact on 9-1-1 traffic, including Automatic Location Identification (ALI), call routing, or data management.

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<sup>1</sup> APCO Comments at p. 2.

Motorola Solutions, Inc. in its comments recommends that the Commission clarify that, in order to be a “covered 9-1-1 service provider,” a provider must have “a direct contractual relationship with a public safety answering point (PSAP), statewide default answering point, or appropriate local emergency authority to provide 9-1-1, E9-1-1 or NG9-1-1 call routing, ALI, or Automatic Number Identification (ANI) service or functional equivalent of those services.”<sup>2</sup> While ATIS NRSC may support some modification to the covered 9-1-1 service provider definition, we believe additional clarity would be needed regarding what a functional equivalent to 9-1-1 call routing and ALI/ANI is, before Motorola Solutions’ proposed change could be considered.

ATIS NRSC is also concerned with the recommendations of NENA: The 9-1-1 Association (NENA) that the Commission consider expanding its 9-1-1 reliability rules to encompass databases and software.<sup>3</sup> ATIS NRSC believes that NENA’s expansion to include databases and software is too expansive and vague. It is not clear to NRSC members what databases or software would “underpin the infrastructure” of NG9-1-1 as suggested by NENA. Moreover, relevant outages to databases and software are reportable under the Commission’s Part 4 rules.

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<sup>2</sup> Motorola Solutions, Inc. Comments at p. 6.

<sup>3</sup> NENA Comments at pp. 1-2.

Many commenters have suggested changes to the Commission’s certification requirements. ATIS NRSC stated in its comments that “ATIS would support the elimination of this requirement, noting that there is no evidence that this requirement has had any significant impact to network reliability or resiliency. Alternatively, should the Commission decide to retain the certification requirement, ATIS NRSC recommends that the Commission consider modifying the rule to require certification less frequency than on an annual basis (e.g., biennially, triennially or even every five (5) years).”<sup>4</sup>

### **III. CONCLUSION**

ATIS appreciates the opportunity to respond to commenters to the *Public Notice* and urges the Commission to consider the input above.

Respectfully submitted,



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<sup>4</sup> NRSC Comments page 4